

June 25, 2015

EPA
Region 4
Freedom of Information Officer

Via Online submission

Dear FOIA Officer:

On behalf of People for the Ethical Treatment of Animals, Inc. and pursuant to the Freedom of Information Act, 5 U.S.C. § 552, and the accompanying Environmental Protection Agency regulations, 40 C.F.R. §§ 2.1-2.4, I am requesting copies of all public records related to the Ringling Bros.' Center for Elephant Conservation located in Polk City, FL.

PETA is prepared to pay a reasonable duplication fee for the fulfillment of this request, but respectfully requests that such fee be waived pursuant to 5 U.S.C. § 552 (a) (4) (A) (iii) and Agency FOIA regulations, 40 C.F.R. § 2.107(d)(1), in light of PETA's non-profit status, PETA's lack of commercial interest in the requested information, and the fact that release of the information will contribute significantly to the public's understanding of EPA's administration and enforcement of EPA and accompanying acts.

PETA's experienced team of research associates and consultants will analyze the information obtained as a result of this FOIA request and disseminate the information to a broad spectrum of the public. The information will contribute to public understanding, as PETA will synthesize and distribute this information to members of the public via one or more of the following methods all of which are, or have been, utilized to inform the public about government operations and activities:

- a. PETA's Websites, including www.peta.org, PETA e-news (with over 1.8 million subscribers), and The PETA Files blog, <http://blog.peta.org/> receive more than 300,000 visitors monthly.
- b. PETA's Publications Department, which distributes "Animal Times," a triannual publication with a worldwide circulation of approximately 400,000 that discuss current topics in the field of animal protection;
- c. PETA's Production and Literature Departments, which prepare and distribute a wide array of educational materials such as brochures, flyers, and posters for distribution to members of the public often at no charge;
- d. PETA's Communications Department, which issues daily press releases and otherwise works with major local, state, national, and international

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PETA FOUNDATION IS AN
OPERATING NAME OF FOUNDATION
TO SUPPORT ANIMAL PROTECTION.

AFFILIATES:

- PETA U.S.
- PETA Asia
- PETA India
- PETA France
- PETA Australia
- PETA Germany
- PETA Netherlands
- PETA Foundation (U.K.)

media outlets on issues of concern; e. PETA's Media Center, which disseminates billboards, print ads, radio advertisements, TV advertisements, and Web banners, and offers "PETA TV"; and

f. PETA's youth outreach campaign, with an e-news service that reaches over 765,000 subscribers.

g. PETA's accounts on social media platforms, including Facebook (more than 5.37 million "likes") and Twitter (more than 673,000 followers), among others; and

h. PETA's Facebook pages have a combined average reach of 111 million people per month.

For the reasons stated above, there is no question that disclosure of the requested records will primarily benefit the public. If this request for a waiver or reduction of fees is denied and fees are expected to exceed \$50.00, please notify me to this effect before this request is processed. In addition, to conserve resources and in accordance with Department regulations, please provide the requested records, to the extent possible, via electronic mail attachment, to TeresaM@petaf.org. I look forward to hearing from you within twenty (20) business days. *See id.* § 2.104 (a).

Very truly yours,

A handwritten signature in black ink that reads "Teresa Marshall". The signature is written in a cursive style with a large, stylized "T" and "M".

Teresa Marshall, Coordinator
Captive Animal Law Enforcement
757-962-8323